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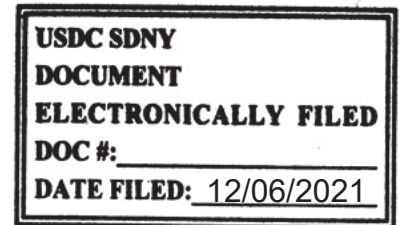
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December 3, 2021

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Barreto Pelon, et al v. Gabi Operating Corp., et al
Docket No.: 19-cv-00502 (RWL)

Your Honor:

Our office represents Plaintiffs in the above-referenced matter. I write, jointly with Defendants' counsel, to respectfully request from the Court a second short extension for the Parties to jointly file all materials necessary for preliminary approval of a class-wide settlement until January 7, 2022. This is the second request of its kind. The Court approved Plaintiffs' first request.

The current deadline to submit the materials for preliminary approval of the settlement is December 8, 2021 (ECF Dkt. 135). The Parties understand Your Honor is only inclined to grant an additional extension for compelling reasons; however, we need some additional time to finalize certain terms. More importantly, there is a large number of Plaintiffs who will need to both review and sign the settlement agreement and our Office needs to get in touch with two Plaintiffs whom we have had difficulty contacting. We are confident that an additional few weeks will allow us to have the settlement agreement reviewed and executed by all necessary parties. In addition, our law firm has recently undergone a change of ownership. In that regard, the new managing partner, Catalina Sojo, Esq., needs time to familiarize herself with this matter and the undersigned needs to review the settlement agreement with Ms. Sojo.

The Parties thank the Court for its time and consideration of this matter.


Respectfully submitted,

/s/ William K. Oates
William K. Oates Esq.
C.S.M. LEGAL, P.C.
Attorneys for Plaintiffs

Extension granted.
No further
extensions absent
compelling
circumstances

cc: Ilan Weiser, Esq. (via ECF)
Attorney for Defendants

SO ORDERED:

 12/06/2021
HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE